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14 Attorneys for Plaintiff SHELDON LOCKETT

11 **UNITED STATES DISTRICT COURT**  
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

14 SHELDON LOCKETT,

15 Plaintiffs,

17 v.

18 COUNTY OF LOS ANGELES, a  
19 public entity; LOS ANGELES  
20 COUNTY SHERIFF'S  
21 DEPARTMENT, a law enforcement  
22 agency; SHERIFF JIM McDONNELL;  
23 MIZRAIN ORREGO, a Deputy Los  
24 Angeles County Sheriff; SAMUEL  
25 ALDAMA, a Deputy Los Angeles  
26 County Sheriff; and DOES 1 through  
27 100, inclusive,  
28 Defendants.

Case No.: 2:18-cv-5838- DSF-JPR

**DECLARATION OF STEVEN C.  
GLICKMAN IN SUPPORT OF  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT COUNTY OF LOS  
ANGELES' MOTION TO STRIKE  
PLAINTIFF'S EXPERT MICHAEL  
KRAUT AND FABRICATION OF  
EVIDENCE CLAIM EXPERT  
OPINIONS**

**Hon. Dale S. Fischer**

**Date: June 7, 2021  
Time: 1:30 p.m.  
Courtroom: 7D**

**DECLARATION OF STEVEN C. GLICKMAN**

I, Steven C. Glickman, declare as follows:

1. I am an attorney admitted to the United States District Court for the Central District of California, and duly licensed to practice law in California. I am a principal at Glickman & Glickman, ALC, co-counsel of record for Plaintiff Sheldon Lockett (“**Plaintiff**”).

2. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief, and as to those, I am informed and believe them to be true. If called as a witness, I could and would testify to the contents of this declaration. I make this declaration in support of Plaintiff’s Opposition to Defendant County of Los Angeles’ (“**County**”) Motion to Strike Plaintiff’s Expert Michael Kraut and Fabrication of Evidence Claim Expert Opinions (“**Motion**”).

3. Counsel for the County, Antonio Kizzie, met and conferred with me via email and telephone prior to filing the County’s Motion. However, in those discussions, we only discussed Plaintiff’s expert Michael Kraut. We did not discuss the other experts that the County seeks to strike in their Motion: Mr. Clark, Mr. Burnett, Dr. Eisen, and Dr. Cooley-Strickland. Because Plaintiff did not have an opportunity to meaningfully meet and confer regarding the other experts, I do not believe the County has fulfilled its obligations under Local rule 7-3.

4. Attached hereto as **Exhibit “1”** is a true and correct copy of Docket No. 41, Plaintiff’s Second Amended Complaint, the operative complaint in this matter.

5. Attached hereto as **Exhibit “2”** is a true and correct copy of Docket No. 211, this Court’s order denying defendant County’s Motion for Summary Judgment.

6. Witness Austreberto “Art” Gonzalez was the first deputy from the Los Angeles Sheriff’s Department (“**Department**” or “**LASD**”) to publicly confirm the existence of a gang of sheriff’s deputies called the “Executioners” that shared the same tattoo as Deputies Aldama and Orrego. The first session of the deposition of Deputy Gonzalez was taken on August 11, 2020. Attached hereto as **Exhibit “3”** is a

1 true and correct copy of relevant portions of Volume I of the deposition transcript of  
2 Deputy Gonzalez. Gonzalez specifically named the deputies at the Compton station  
3 that belonged to the “Executioners,” either as “inked” members who already had the  
4 Executioners tattoo or prospects “chasing ink,” e.g., deputies who are “encouraged  
5 to do shootings or violent acts in order to get inked” [Gonzalez Depo., Vol I., 39:23-  
6 40:10].

7 7. Attached hereto as **Exhibit “4”** is a true and correct copy of Docket No.  
8 56, this Court’s order denying in part and granting in part the County’s Motion to  
9 Dismiss.

10 I declare under penalty of perjury under the laws of the United States of  
11 America and the State of California that the foregoing is true and correct.

12 Executed this 17th day of May 2021, at Sherman Oaks, California.

13 By           /Steven C. Glickman            
14 Steven C. Glickman  
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